

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re:	§	
	§	
DEEP MARINE HOLDINGS, INC.,	§	Case No. 09-39313
et al.	§	
	§	
Debtors.	§	Jointly Administered
	§	Chapter 11

DEEP MARINE 1, LLC	§	
	§	
Plaintiff,	§	
	§	
v.	§	Adversary No. 10-03271
	§	
THE DEEP MARINE LIQUIDATING	§	
TRUST (AS SUCCESSOR TO DEEP	§	
MARINE TECHNOLOGY	§	
INCORPORATED, DEEP MARINE	§	
HOLDINGS, INC., DEEP MARINE 1,	§	
LLC, DEEP MARINE 2, LLC, DEEP	§	
MARINE 3, LLC, AND DEEP MARINE	§	
4, LLC); GENERAL ELECTRIC	§	
CAPITAL CORPORATION; NOBLE	§	
DENTON MARINE, INC.; BNA	§	
MARINE SERVICES, LLC; OTTO	§	
CANDIES, LLC; B&J MARTIN, INC.;	§	
NREC POWER SYSTEMS, INC.;	§	
CAPROCK COMMUNICATIONS, INC.;	§	
BOLLINGER SHIPYARDS TEXAS	§	
CITY, LP; BOLLINGER FOURCHON,	§	
LLC; ARAMARK US OFFSHORE	§	
SERVICES, LLC; AND CROSSMAR,	§	
INC.	§	
	§	
Defendants.	§	

**OTTO CANDIES, L.L.C.'S ANSWER TO THE DEEP MARINE LIQUIDATING
TRUST'S CROSS CLAIM & OBJECTIONS TO PROOFS OF CLAIMS OF
CERTAIN DEFENDANTS**

NOW COMES Otto Candies, L.L.C. ("Otto Candies") as cross defendant, and files this answer to The Deep Marine Liquidating Trust's Cross Claim & Objections to Proofs of Claims of Certain Defendants.

1. Otto Candies avers that the allegations of Paragraph 1 of the Cross Claim require no answer, but if an answer should be required, then the allegations are denied for lack of sufficient information to form a belief as to the truth of said allegations.
2. Otto Candies denies the allegations of Paragraph 2 of the Cross Claim for lack of sufficient information to form a belief as to the truth of said allegations.
3. Otto Candies avers that the allegations of Paragraph 3 of the Cross Claim contain conclusions of law that require no answer, but should an answer be required, then Otto Candies denies the allegations for lack of sufficient information to form a belief as to the truth of said allegations.
4. Otto Candies avers that the allegations of Paragraph 4 of the Cross Claim contain conclusions of law that require no answer, but if an answer should then Otto Candies denies the allegations of Paragraph 4 of the Cross Claim for lack of sufficient information to form a belief as to the truth of said allegations.
5. Otto Candies denies the allegations of Paragraph 5 of the Cross Claim for lack of sufficient information to form a belief as to the truth of said allegations.

6. Otto Candies denies the allegations of Paragraph 6 of the Cross Claim for lack of sufficient information to form a belief as to the truth of said allegations.
7. The allegations of Paragraph 7 of the Cross Claim require no answer, but should an answer be required, Otto Candies re-avers its responses to each of the preceding allegations of the Cross Claim.
8. Otto Candies avers that the allegations of Paragraph 8 of the Cross Claim require no response, but if a response is required, then the allegations of Paragraph 8 are denied for lack of sufficient information to form a belief to the truth of said allegations.
9. Otto Candies avers that the allegations of Paragraph 9 of the Cross Claim require no response, but if a response is required, then the allegations of Paragraph 9 are denied for lack of sufficient information to form a belief to the truth of said allegations.
10. Otto Candies avers that the allegations of Paragraph 10 of the Cross Claim require no response, but if a response is required, then the allegations of Paragraph 10 are denied for lack of sufficient information to form a belief to the truth of said allegations.
11. Otto Candies avers that the allegations of Paragraph 11 of the Cross Claim require no response, but if a response is required, then the allegations of Paragraph 11 are denied for lack of sufficient information to form a belief to the truth of said allegations.

12. Otto Candies avers that the allegations of Paragraph 12 of the Cross Claim require no response, but if a response is required, then the allegations of Paragraph 12 are denied for lack of sufficient information to form a belief to the truth of said allegations.
13. The allegations contained in Paragraphs 1 through 22 of the Objections to Proofs of Claim require no response from Otto Candies

WHEREFORE, Otto Candies, L.L.C. prays, that after due proceedings had, that there be judgment in favor of Otto Candies, L.L.C. finding that its preferred lien for seamen's wages should be paid out of the proceeds of the sale of DMT DIAMOND in preference and priority to any claim of the Deep Marine Liquidating Trust's or any other defendant, and that its general maritime lien for other services provided to the DMT DIAMOND be recognized by the Court and paid in preference and priority to any unsecured creditor and that the Court award any other legal and equitable relief to Otto Candies, as may be appropriate under the circumstances.

RESPECTFULLY SUBMITTED,

/s/Thomas S. Henderson
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(B0384995.1)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing pleading has been served electronically upon all counsel of record subscribed to the Court's CM/ECF system in this case on this 31st day of August, 2010.

/s/Thomas S. Henderson